

EXHIBIT “A”

RUKHSANA Y. AGHA V. JOSE L. RAMIREZ AND JB HUNT TRANSPORT INC.

Summons and Verified Complaint

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
RUKHSANA Y. AGHA,

Plaintiff,

-against-

JOSE L. RAMIREZ and JB HUNT TRANSPORT INC.,

Defendants,
-----X

Index No.:
Date Purchased:

16406619

SUMMONS

Plaintiffs designate Queens
County as the place of trial.

The basis of venue is:
Plaintiff residence

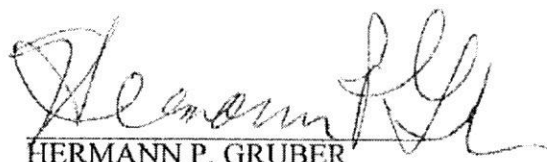
Plaintiffs reside at:
248-20 89th Avenue
Bellerose, NY 11426

County of Queens

To the above named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, New York
December 7, 2018



HERMANN P. GRUBER
STEINBERG & GRUBER, P. C.
Attorney for Plaintiff
RUKHSANA Y. AGHA
300 Garden City Plaza, Ste. 218
Garden City, New York 11530
(516) 663-0999

TO:
Jose L. Ramirez
1058 Salamanca Dr
Tobyhanna, PA 18466

JB Hunt Transportation Inc.,
705 B. North Bloomington
Lowell, AR 72745

CORPORATE SEAL

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS-----X
RUKHSANA Y. AGHA,

Plaintiff,

-against-

Index No.:

Date Purchased:

VERIFIED COMPLAINT

JOSE L. RAMIREZ and JB HUNT TRANSPORT INC.,

Defendants,
-----X

Plaintiff, by her attorneys, **STEINBERG & GRUBER, P. C.**, complaining of the Defendant, respectfully allege, upon information and belief:

1. At all times herein mentioned, Plaintiff was, and still is, a resident of the County of Queens, State of New York.
2. At all times herein mentioned, Defendant, **JB HUNT TRANSPORT INC.** was the owner of a 2016 Infinity motor vehicle bearing New York registration number 2WL695.
3. At all times herein mentioned, Defendant, **JOSE L. RAMIREZ** was the operator of a 2016 Infinity motor vehicle bearing New York registration number 2WL695.
4. At all times herein mentioned, Defendant, **JOSE L. RAMIREZ** operated the motor vehicle with the permission, knowledge and consent of Defendant, **JB HUNT TRANSPORT INC.**.
5. At all times herein mentioned, Defendant, **JOSE L. RAMIREZ** operated the aforementioned motor vehicle within the scope of his employment with the Defendant, **JB HUNT TRANSPORT INC.**.
6. At all times herein mentioned, Defendant, **JB HUNT TRANSPORT INC.** managed, maintained and controlled the aforesaid motor vehicle.

7. At all times herein mentioned, Defendant, **JOSE L. RAMIREZ** managed, maintained and controlled the aforesaid motor vehicle.

8. At all times herein mentioned, Plaintiff, **RUKHSANA Y. AGHA** was the operator of a 2004 Toyota motor vehicle bearing New York State registration number DWS8215.

9. At all times herein mentioned, Interstate 84 and exit 5a, Montgomery New York were public roadways, streets and/or thoroughfares.

10. That on December 9, 2016, Defendant, **JOSE L. RAMIREZ** was operating the vehicle owned by **JB HUNT TRANSPORT INC.**, at the aforementioned location.

11. That on December 9, 2016, Plaintiff, **RUKHSANA Y. AGHA** was operating her motor vehicle at the aforementioned location.

12. That on December 9, 2016, at the aforementioned location, the motor vehicle owned by Defendant, **JB HUNT TRANSPORT INC.** and operated by Defendant, **JOSE L. RAMIREZ** struck the motor vehicle operated by Plaintiff, **RUKHSANA Y. AGHA**.

13. That as a result of the aforesaid contact, Plaintiff, **RUKHSANA Y. AGHA** was injured.

14. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

15. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants were otherwise negligent, careless, reckless and grossly negligent under the circumstances then and there prevailing.

16. That by reason of the foregoing, Plaintiff, **RUKHSANA Y. AGHA** sustained severe and permanent personal injuries; and Plaintiff, **RUKHSANA Y. AGHA** was otherwise damaged.

17. That Plaintiff, **RUKHSANA Y. AGHA** sustained serious injuries as defined by §5102 (d) of the Insurance Law of the State of New York.

18. That Plaintiff, **RUKHSANA Y. AGHA** sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

19. That Plaintiff, **RUKHSANA Y. AGHA** is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. Plaintiff is seeking to recover only those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

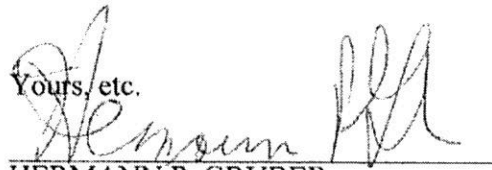
20. That this action falls within one or more of the exceptions set forth in CPLR §1602.

21. That by reason of the foregoing, Plaintiff, **RUKHSANA Y. AGHA** has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff(s) demand(s) judgment against the Defendants herein on all causes of action, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Garden City, New York
December 7, 2018

Yours, etc.


HERMANN P. GRUBER
STEINBERG & GRUBER, P. C.
Attorney for Plaintiff
RUKHSANA Y. AGHA
300 Garden City Plaza, Ste. 218
Garden City, New York 11530
(516) 663-0999

ATTORNEY VERIFICATION

I, HERMANN P. GRUBER, the undersigned, an attorney admitted to practice in the Courts of New York State, state that I am the attorney for the plaintiff in the within action; I have read the foregoing **COMPLAINT** and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by the said plaintiff is because said plaintiff resides outside the county where I maintain my office.

The grounds of my belief as to all matters not stated upon my own knowledge are based on information contained in my office files and records.

I affirm that the foregoing statements are true under the penalty of perjury.

Dated: Garden City, New York
December 7, 2018


HERMANN P. GRUBER